



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 6, 2014

ELIZABETH CURTIS, TREASURER
LONEGAN FOR CONGRESS INC
PO BOX 1607
MEDFORD, NJ 08055

Response Due Date
12/11/2014

IDENTIFICATION NUMBER: C00555284

REFERENCE: JULY QUARTERLY REPORT (05/15/2014 - 06/30/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 6 item(s):

1. While it is permissible for a person to make a contribution for the general election prior to the primary election, the recipient committee must employ an acceptable accounting method to distinguish between primary and general election contributions. (11 CFR § 102.9(e)) This general election amount must be maintained in the committee's account.

Since the candidate will not participate in the general election, any contribution received for the general election must be returned to the donors or redesignated to the primary if your committee has net debts outstanding for the primary election. The Commission notes your additional explanation regarding the committee's corrective action taken for some of these contributions. To redesignate a contribution the committee must either (1) obtain signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) redesignate the contribution by presumption to the primary election, for undesignated contributions made after the primary but before the general election, provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing. The notification must give the contributor an opportunity to request a refund. A contribution can only be redesignated to a previous election to the extent that the contribution does

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not exceed net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i) and (5)(ii)(C))

Any subsequent report(s) filed with the Commission must disclose the refund or redesignation of any general election contribution. Refunds or redesignations must be done within 60 days after the 2014 Primary Election.

Although the Commission may take further legal action, your prompt action to refund these contributions will be taken into consideration.

2. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information.

3. Commission Regulations require the continuous reporting of all outstanding debts. This report omits debts itemized on your previous report(s). (11 CFR §§ 104.3(d) and 104.11) Please file an amendment to your report to disclose the current status of these omitted debts: \$2767.50 to Century Data Systems Corp; \$10,035.60 to Colortree Marketing Resources; \$764.12 to Donor Precision LLC; and \$1039.50 to Hahn, Gretchen.

4. Your report discloses debts with outstanding beginning balances that do not equal the corresponding closing balances of your previous report (see attached). These amounts should be the same. Please correct these discrepancies and file an amendment to your report(s). (52 U.S.C. § 30104(b) (8) (formerly 2 U.S.C. § 434(b)(8)) and 11 CFR § 104.11)

5. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in an election

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cycle. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The attached employer and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed

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description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

6. Schedule C of your report discloses loans from the candidate where the aggregate amount outstanding in excess of \$250,000.00 was not repaid within 20 days after the primary election.

Outstanding loan amounts from the personal funds of the candidate aggregating in excess of \$250,000.00 and designated to the primary election must be repaid within 20 days after that election. If loans are not repaid by the twenty-day deadline, the committee must treat the portion of the aggregate outstanding balance that exceeds \$250,000.00 as a contribution from the candidate, which cannot be repaid. (11 CFR § 116.11)

If any of the apparent loans in question were incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. Otherwise, you must amend your report to show the outstanding balance of candidate loans for the primary election exceeding \$250,000.00 as a contribution from the candidate.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1130.

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Sincerely,

A handwritten signature in black ink, appearing to read 'Jaime', with a stylized, flowing script.

Jaime Amrhein
Campaign Finance Analyst
Reports Analysis Division

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Missing 48-Hour Notices
Lonegan For Congress Inc. (C00555284)

| Contributor Name | Date | Amount | Election |
|---------------------|---------|--------------|----------|
| Lonegan, Steven Mr. | 5/23/14 | \$100,000.00 | P2014 |

Debts with Balance Discrepancies
Lonegan For Congress Inc. (C00555284)

| Name | Closing Balance Previous Report | Opening Balance Current Report |
|-------------------------------|--------------------------------------------|-------------------------------------------|
| Century Data Systems Corp | \$7,101.24 | \$0.00 |
| Consolidated Mailing Services | \$11,398.18 | \$0.00 |
| Integram | \$37,846.32 | \$27,856.02 |
| Legacy Lists Inc - Brokerage | \$16,600.95 | \$0.00 |

Inadequate Employer/Occupation Entries
Lonegan For Congress Inc. (C00555284)

| Employer | Occupation |
|-----------------------|-----------------------|
| A chemical company | A sales engineer |
| Diplomat | Diplomat |
| Doctor | Doctor |
| Engineer | Engineer |
| Information Requested | Information Requested |
| None | None |
| Requested | Requested |
| Security | Security |
| Self | Requested |
| Self Employed | Self Employed |
| Social Services | Provider |
| Teacher | Teacher |